



**Attorney General
Betty D. Montgomery**

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December 28, 2001



Via Federal Express

Magalie R. Salas, Secretary
Federal Communications Commission
445 12th Street S.W.,
Washington, DC 20554

Re: *Federal-State Joint Board on Universal
Service, CC Docket No. 96-45/*

Dear Secretary Salas:

Enclosed please find the original and two copies of the comments of the Public Utilities Commission of Ohio in the above referenced case. Please return one time-stamped copy in the enclosed self-addressed, stamped envelope.

Thank you for your attention to this matter.

Respectfully submitted,

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**Before the
Federal Communications Commission
Washington, D.C. 20554**



In the Matter of)
)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)

COMMENTS OF

THE PUBLIC UTILITIES COMMISSION OF OHIO

INTRODUCTION

On October 12, 2001, the Federal Communications Commission (FCC) released a Public Notice inviting comments concerning the review of its Lifeline and Linkup programs. The FCC notes that these programs are used to preserve and advance universal service and to ensure that quality telecommunications and information services are available to low-income consumers at just, reasonable and affordable rates, as required by the Telecommunications Act of 1996. Among other things, the FCC Public Notice invites comments on the effectiveness of the FCC's existing Lifeline/Link-Up rules.

The Public Utilities Commission of Ohio (Ohio Commission) hereby submits its comments responding to the FCC's October 12, 2001 invitation for public input.

DISCUSSION

The Ohio Commission's comments on Lifeline are based on extensive research of, and information obtained through three studies surrounding the non-telephone household population and Lifeline programs, as well as Ohio's long-term experience in the administration of Lifeline programs.

The FCC should consider these issues, the information, and the research regarding the structure and process surrounding the federal Lifeline program. Based on the insight gained through the research and information, the Ohio Commission recommends that the FCC:

- Adopt an income criteria based on at least 150 percent of the poverty level;
- Continue to support self-certification;
- Require automatic enrollment of eligible consumers;
- Require telephone companies to have a marketing budget to promote the Lifeline program;
- Exclude vertical features from the plan unless a customer can demonstrate the need for such services; and
- Prohibit telephone companies from marketing vertical features to Lifeline customers.

Income Criteria

The research and results of two Ohio non-telephone household studies provide a strong basis for including income criteria as eligibility for Lifeline. The income criteria would direct Lifeline at the working poor who are unable to afford telephone service. If household income is at or below 150 percent of the poverty level, the household should qualify for the program.

In its First Report and Order on Universal Service (FCC 97-157, released May 1997), the FCC determined that states providing intrastate matching Lifeline funds may establish their own eligibility criteria, but such criteria must be based “solely on income or factors directly related to income.” (*Id.* at ¶ 373.) In the same Order, the FCC also set forth its default Lifeline verification procedure for states that do not provide matching intrastate Lifeline support. The default procedure calls for carriers to obtain a customer’s signature on a document by which the customer: 1) certifies under penalty of perjury that the customer is receiving benefits from one of the qualifying programs included in the FCC’s default eligibility criteria list; 2) identifies the program or pro-

grams from which the customer receives benefits; and 3) agrees to notify the carrier if the customer ceases to participate in such program or programs. (*Id.* ¶ 377.)

The Ohio Commission suggests that adopting the 150 percent threshold criterion would clearly comport with the FCC's income-based objective, and could also be easily incorporated into its default verification procedure. Rather than requiring the customer to attest to its participation in a qualifying program, the customer would instead certify (under penalty of perjury) that its household income falls at or below the threshold.

In the Matter of the Joint Application of SBC Communications Inc., SBC Delaware Inc., Ameritech Corporation, and Ameritech Ohio for Consent and Approval of a Change of Control, PUCO Case No. 98-1082-TP-AMT, Ameritech was required to perform a non-telephone household study as a commitment in the SBC/Ameritech merger case. The purpose of the study commitment was to determine the various causes of non-telephone households in Ameritech Ohio's current service territory and to determine the best methods for decreasing the number of non-telephone households (Stipulation and Recommendation at Section VIII.C). Ameritech filed its report and research on May 7, 2001 (Appendix A). Additionally, a non-telephone household study was performed by Verizon for the same purpose (*In the Matter of the Joint Application of Bell Atlantic Corporation and GTE Corporation for Consent and Approval of a Change in Control*, PUCO Case No. 98-1398-TP-AMT).

In the Ameritech study those who said that they would qualify for either USA plan (the state plan – Plan 1 and the federal plan – Plan 2) tend to have resistance to receiving assistance and applying for financial help. Of the households without telephones in Ameritech's Ohio service territory, 70% of the participants were either extremely interested or very interested in signing up for either USA plan if they were eligible based on income. For example, of the 343 respondents without telephones in

the Ameritech study, 60% are employed but are still without telephone service. Of those 60%, 41% are employed full-time. The results clearly indicate that telephone service is not affordable to many, even when they have full time employment. Eligibility based solely on participation in one or more specified means-tested programs excludes families that are low-income but not receiving government assistance. There were 66% of the customers who qualify for Lifeline that identify that they do not want public assistance; this was particularly the case among senior citizens. In the Verizon study, 39% of the respondents without telephones indicated that they were employed.

In the Verizon study, 71% of the respondents, whether they qualified for the program or not, were very interested or extremely interested in the Lifeline plan. There were only 58% of the respondents without telephones who indicated that they would qualify for Lifeline based on the qualifying programs; 39% responded that they would not qualify, i.e., did not participate in a qualifying program. There were 69% of the Verizon respondents who indicated that if they were not on a qualifying program but could qualify under low-income criteria that they would participate in Lifeline. There were 62% of the respondents who indicated that they would be willing to send income verification to the company.

Self-Certification

The Ohio Commission recommends self-certification of income eligibility and permitting a company to perform a verification audit of a customer applying for or a customer already on Lifeline assistance service. In the Ameritech study, 75% of the respondents without telephones indicated that they would be willing to show proof of their total annual income for verification purposes.

Automatic Enrollment and Promotion and Educational Programs

The Lifeline program should include a marketing budget to promote the program and work with an advisory board to design and implement the marketing program. Automatic enrollment is also a critical feature of an effective Lifeline program.

The USA Advisory Board brought a complaint to the Ohio Commission against Ameritech to require the Company to abide by the terms of its Lifeline commitment. *In the Matter of the Application of the Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation*, PUCO Case No. 93-487-TP-ALT (Opinion and Order) (December 30, 1998). The Ohio Commission found in favor of the Advisory Board. The Ohio Commission found that Ameritech had not materially complied with the terms of the USA program. *Id.* at 31. The Ohio Commission required Ameritech to perform a drop-off study to determine the reasons why people were dropping off of their Lifeline program.

Ameritech has been responsible for promoting its Lifeline program since its adoption of an alternative regulation plan in 1994. Additionally, as a result of the complaint case brought against Ameritech, the Ohio Commission required the Company to intensify and focus its promotional and education campaign about Lifeline. The Ameritech non-telephone household study found that of those people in Ameritech Ohio's service territory without telephones, only 14% were aware of USA Plan 1 (state plan) and only 10% were aware of Plan 2 (federal plan). Given the incredibly low awareness levels, automatic enrollment is the most effective method for assuring that eligible customers receive Lifeline assistance. In the Verizon study, 15% of the respondents without telephones were aware of a special service for low-income people.

Promotion and education programs are also critical to raise awareness levels. Those households that do not participate in qualifying programs but would qualify on

the basis of income are going to need to become aware of Lifeline in order to consider signing up for the program. Promotion and education efforts should be implemented with the assistance of an advisory board composed of groups that work with the low-income community. These programs are significantly enhanced by their expertise in communicating with the low-income population.

Limitation of Vertical Features

The drop off study conducted by Ameritech offered some remarkable insights regarding vertical services. The study was performed in 1999. Over a three-month period during the year, 38.47% of Plan 1-Lifeline customers dropped off of the network because they were unable to pay their bill. Over the same three-month period, there were 71.76 of Plan 2 lifetime customers who dropped off of the network because they were unable to pay their bill. Under Plan 1, Lifeline customers are not permitted to purchase any vertical services. Under Plan 2 (the federal plan) Lifeline customers are permitted unlimited access to purchase vertical services. Those customers dropping off of the network are almost twice as high under Plan 2 as compared to Plan 1.

Ameritech analyzed the number of vertical services that were being purchased by customers. Ameritech based this analysis on customer use of vertical services at one point in time in March 1999. Plan 1 customers are not permitted to purchase vertical services. Ameritech determined that the average number of vertical services used by a customer who was not on Lifeline was 3.5. Those customers on the Plan 2 (federal) Lifeline program used an average of 6.5 vertical services.

The Lifeline program should limit the ability of a participant to purchase vertical services. One of the most compelling pieces of evidence found in the research was that among the most significant reasons for customers losing their telephone service was

their inability to pay for the vertical services in their local telephone bill. It is important to have a disconnect policy which does not permit a customer to be disconnected from local service if they are in arrears on a long-distance bill. The long distance portion of the bill cannot explain drop offs from the network in Ohio, which does not have such a disconnect policy. There could be other factors involved in why a Plan 2-Lifeline customer is unable to afford their bill. Given the disconnect policy and the results from the drop off study, it is hard to ignore the role of vertical services in the household budget equation. The Ohio Commission believes that it is not in the public interest to allow a Lifeline customer unlimited access to vertical services. Additionally, the Ohio Commission recommends that the FCC prohibit telephone companies from marketing vertical services to existing or new Lifeline customers.

The organizations that represent low-income constituencies have made a long-standing argument that call-waiting has a public interest benefit for low-income households that is greater than it is for the general population due to the higher prevalence of extended families living in a household among the low-income population. Additionally, the optional features must be prohibited unless the phone company receives a signed statement from the customer self-certifying that the feature is necessary for medical and/or safety reasons.

Ohio Alternative Regulation Plan

On December 6, 2001, the Ohio Commission adopted an alternative regulation plan for incumbent local exchange carriers (Case No. 00-1532-TP-COI). Among other things, the elective alternative regulation plan requires that, in exchange for certain pricing freedoms, companies are required to offer advanced services and to cap basic local exchange service rates at current levels. In exchange for this additional pricing flexibility, the Ohio Commission has also required companies electing alternative regulation to provide an intrastate Lifeline plan consistent with all of the recommendations contained in these comments. The rules adopted in PUCO Case No. 00-1532-TP-COI also ensure that Ohio's Lifeline customers realize the maximum contribution of Federal assistance. To date, no ILEC has opted into Ohio's recently adopted rules. Attached as Appendix B to these comments are the Ohio Commission's rules adopted in PUCO Case No. 00-1532-TP-COI.

CONCLUSION

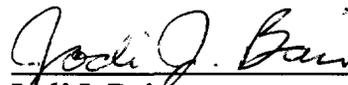
For the reasons identified above, the Ohio Commission recommends that the FCC adopt for Lifeline customers an income-based criteria at 150 percent of the poverty level, automatic enrollment, self-certification, require companies to promote Lifeline services, impose limitations on vertical services, and require a corresponding prohibition of the marketing of vertical services to Lifeline customers.

The Ohio Commission thanks the FCC for the opportunity to file comments in this proceeding.

Respectfully Submitted,

**On Behalf of the Public Utilities
Commission of Ohio**

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Dated: December 28, 2001

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Joint Application)
of SBC Communications Inc., SBC)
Delaware, Inc., Ameritech Corporation,)
and Ameritech Ohio)
for Consent and Approval)
of a Change of Control.)

Case No. 98-1082-TP-AMT

AMERITECH OHIO'S REPORT

I. Introduction

Ameritech Ohio, by its attorneys, submits this report as called for in the Stipulation and Recommendation adopted by the Commission in the captioned case on April 8, 1999. Section VI.B of the Stipulation and Recommendation provides that Ameritech Ohio shall maintain the USA (Lifeline) program as described in its Alternative Regulation Plan until at least January 9, 2002. Section VIII.C provides as follows:

Non-Telephone Households Studies. Commencing within 3 months following the Merger Closing Date and ending within 15 months following such commencement date, Ameritech Ohio will complete a series of studies to determine the various causes of non-telephone households in Ameritech Ohio's current service territory. This research will be conducted by Ameritech Ohio in conjunction with the substantial involvement of the Commission Staff, OCC, Edgemont, and any other consumer group that is a Supporting Stipulating Party, which involvement will begin within 30 days following the Merger Closing Date. Upon request of a consumer group that is a Supporting Stipulating Party, Ameritech Ohio will pay up to \$5,000 in total to one or more such groups for their use in obtaining an expert or experts to assist in the preparation, review, and analysis of this non-telephone household research. The studies will be designed to identify valid findings and conclusions as to the causes of non-telephone households in Ameritech Ohio's current service territory. Once the reasons for non-telephone households have been identified, Ameritech Ohio, in conjunction

with the Commission Staff, OCC, Edgemont, and any other consumer group that is a Supporting Stipulating Party will develop potential short and long-term practices and policies designed to decrease the number of non-telephone households in Ameritech Ohio's current service territory. Ameritech Ohio will file a report with the Commission within 30 days after the conclusion of such studies as to those practices or policies it has elected to implement.

In fulfillment of this commitment, Ameritech Ohio commissioned Wirthlin Worldwide to conduct qualitative and quantitative studies to determine the various causes of non-telephone households in Ameritech Ohio's current service territory. The studies enabled identification of potential short and long-term practices and policies designed to decrease the number of non-telephone households in Ameritech Ohio's current service territory and to maximize the reach of Ameritech Ohio's existing lifeline program in the state of Ohio. In fulfillment of the reporting requirement quoted above, Ameritech Ohio files this report with the Commission indicating those practices or policies it has elected to implement.

II. Background

Ameritech Ohio's USA program was initiated under its Alternative Regulation Plan (Exhibit G), adopted by the Commission on November 23, 1994, in Case No. 93-487-TP-ALT. That plan sets forth the eligibility criteria and the applicable rates for eligible services. In addition, the plan established an advisory committee, consisting of consumer and low-income representatives and the Staff. In a settlement agreement dated May 22, 1996, in Case No. 96-532-TP-UNC, Ameritech Ohio agreed to fund a plan in the amount of \$122,000 per year to enhance its USA program. Further, as part of the merger stipulation in the above-captioned case, Ameritech/SBC committed to continuing the USA program, as described in the Company's Alternative Regulation Plan, until January 9, 2002. In the stipulation that extended Ameritech Ohio's Alternative Regulation Plan, dated March 27, 2000, the USA program was extended until

July 8, 2003. In addition, in that stipulation the Company committed to increasing the promotional budget for the USA program from \$122,000 to \$276,000 per year for 2001 and 2002.

Ameritech Ohio, in conjunction with the Commission Staff, the Ohio Consumers' Counsel, The Edgemont Neighborhood Coalition, and Parkview Area Wide Seniors, Inc. mutually selected and contracted with Wirthlin Worldwide and Patricia D. Rossi (through Wirthlin) to conduct the research as required by the Stipulation. Wirthlin's studies are attached hereto as Exhibit A (the quantitative study) and Exhibit B (the qualitative study).

Focus groups were held in Cleveland as well as some one-on-one interviews with customers in rural areas. Wirthlin followed those interviews up with quantitative and qualitative research directed at Ohio citizens who did not have landline telephone service. The research results were shared with the parties beginning in December 2000. After that time, several meetings were held among the participants to discuss the research results. After fully considering the short-term and long-term recommendations, Ameritech Ohio reports to the Commission as to the practices or policies it plans to implement. This report provides some background on the recommendations that will be adopted and the manner in which the Company plans to adopt them.

III. Ameritech Ohio will take steps to increase lifeline awareness

The studies that have been conducted have shown that, in general, there is a relatively low awareness about the availability of subsidized telephone service in Ohio. Only 14% of the base were aware of USA Plan #1 and 10% were aware of USA Plan #2 (the federal lifeline program). Based on these figures, Ameritech Ohio believes that it needs to increase the awareness of the USA program.

A. Ameritech Ohio will expand the outreach program promoting the USA Plan
Ameritech Ohio has expanded the outreach program by allocating \$120,000 of the \$276,000 allocated to the USA program to be given to qualified outreach organizations. This is an increase of 300% over last year, when \$40,000 was given out to organizations. In addition, the Company will utilize its existing External Relations team and its resources to further extend its state-wide outreach activities by working with targeted groups, churches, and social service agencies. The External Relations team is committed to offering lifeline speaking/training sessions explaining the service to frontline associates in targeted social service agencies twice each year.

Ameritech Ohio is committed to continuing improvement of the outreach program and ensuring that the individual organizations are accountable. Ameritech Ohio believes that the organizations that are approved to perform the outreach function should be different year over year to reach a diverse group of customers. The approved organizations should demonstrate that they are meeting with the potentially qualified customer base and that they use the outreach funds efficiently and effectively. Currently the USA Advisory Board solicits RFPs from various organizations. The Board then conducts an open vote to select the organizations that will be approved and funded. The Company recommends that this procedure be replaced with a closed/blind and confidential vote so that board members do not feel any pressure to approve organizations that are represented on the board or any other pressure they might feel in an open vote. Ameritech Ohio would then make the final decision as to what organizations will be approved for outreach.

B. Ameritech will enhance its media plan for USA

The Company has implemented a USA-specific media plan. This plan uses census data to determine target markets that have the largest concentration of potentially qualified lifeline customers. Ameritech Ohio has allocated \$126,452 of the \$276,000 allocated to the USA program to this media effort.

The Company has worked closely with an advertising agency to determine what would be the most effective way to get the message to as many potentially qualified customers as possible. Customers in the quantitative research said the best way to reach them with the lifeline message is via mail (42%), television/radio (32%), fliers delivered to the home (23%), newspapers (23%), and social service agencies (20%). After studying census data in great detail, the agency found that the largest population group of potentially qualified customers is African -American. These customers tend to be concentrated in the six metropolitan areas in the state.

Based on the findings of the research, the agency recommended that radio be used as the medium to reach as many of these customers as possible and that the radio ads be purchased to skew toward African-American listeners. Radio is the most cost efficient way of reaching this market since there are a number of radio stations that are targeted toward varying age groups of African Americans. Moreover, indigent consumers are more apt to have access to a radio at all times, versus a television.

C. Ameritech Ohio will address public misconceptions about establishing telephone service and the USA program

One of the findings of the research is that one-third of the survey participants identified installation charges and deposits as a barrier to obtaining telephone service. The inability to afford the installation charges or a deposit was cited as the leading reason for not having a phone.

The USA program addresses both of these concerns, because installation charges are waived and no deposit is required. There is also a misconception of the cost of basic local telephone service. The study revealed that consumers believe that the monthly charge for phone service is more than it actually is. Thus, it appears that there is a need for additional communication of the specific benefits of the USA program to the target audiences.

The USA vendor and the Ameritech service representatives will have updated call flow documents, including an on-line job aid, that emphasize the installation charge waiver and clearly state that a deposit is not required for USA subscribers. In addition, the radio ad that is being developed also places a strong emphasis on the fact that 100% of the installation charges are waived and there are no deposit requirements. The fliers that are used for outreach and handed out at various locations are also being updated to incorporate this information more clearly. These steps will help insure that there is greater public awareness of the lifeline plans and the specific benefits that are available to subscribers and potential subscribers under the plans.

In addition, Ameritech Ohio will address the financial barriers to USA program enrollment, both real and perceived. The studies also found that 24% of customers say the cost to make or receive long distance calls is too expensive and is a perceived reason for not having telephone service. In response to this specific concern, the Company will continue to advise potential USA program customers of the availability of free toll restriction service for lifeline customers. The Company changed its USA program to put a greater emphasis on the fact that toll restriction and 900/976 call blocking are available, the benefits of these features, and the fact that they are free to lifeline customers.

IV. Ameritech will address the reconnection issues that have been identified

The studies also showed that former customers who still owe money on their previous telephone service are the ones who are most interested in reestablishing service. However, those that owe money on previous service see that as a barrier to reestablishing service.

A. The availability of payment plans for prior debt

The studies showed that interest in reconnecting is twice as high among consumers who have past due bills. (58% vs. 29% for consumers that do not owe anything). Consumers with balances need to be made aware of the payment options and payment requirements in order to expedite reinstatement of their phone service. In order to ensure that customers clearly understand that only the deniable/local portion of the bill has to be paid in order to reconnect local service, and that payment arrangements are available, the advertising pieces and radio piece have been modified to place a greater emphasis on the availability of payment options.

"Final bill" customers (those who have final bills on disconnected service) will be notified about USA and the availability of payment arrangements via the first collection letter that is mailed to them. On average, customers should be receiving this notice within 8-10 days of having a final bill. June 1, 2001 is the target date for this letter. In addition, the Company will consider including the USA program flier in the pre-collection letter as well, in an effort to obtain greater readership of the lifeline information. Ameritech Ohio suggests that funding for this insert should come out of the annual USA program budget.

Ameritech Ohio will also continue on-going training and monitoring in the credit and collections channels to assist in identifying eligible customers and to alert them to the availability of lifeline options. In addition, the Company will continue to work with an ethnically diverse

group of outreach organizations, ensuring that they are sharing the availability of payment options with their clients.

B. Addressing other financial issues

Another finding of the study is that non-Caucasians are more likely to identify financial reasons for not reconnecting their telephone service. The study found that non-Caucasians are significantly more likely than Caucasians to have difficulty paying off telephone bill debts (49% vs. 38%) or to state that they do not have the money or cannot afford the service (46% vs. 29%). The radio ad that is skewed towards African Americans has been modified to include information about payment options to help customers understand that they can obtain deferred payment arrangements on previous final bills.

V. Long-term commitment

Ameritech Ohio is willing to consider implementing automatic enrollment for USA Plan #2. However, in light of staff's proposed changes to the structure of the lifeline program in Case No. 00-1532-TP-COI, Ameritech Ohio intends to wait until the final outcome of that rulemaking docket before it makes such a commitment.

VI. Conclusion

The company believes that the existing USA lifeline plans are comprehensive, fair and responsive to the needs of its customers and potential customers. The strength of the plans as they exist is demonstrated by the fact that the Ameritech Ohio lifeline plan was selected as the model lifeline plan, to be offered in all 13 SBC states, as a condition of the Ameritech/SBC merger. There is, however, room for improvement in how this plan is shared with Ohio customers and the Company looks forward to working with the Commission, its Staff, and other interested parties in implementing the practices and policies that it has identified in this report and analyzing results from 2001 to determine the most effective allocation of funds for the 2002 USA plan budget.

Respectfully submitted,

AMERITECH OHIO

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Report was served via first class mail, postage prepaid, on the parties listed below on this 7th day of May, 2001.



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NON-PHONE QUANTITATIVE STUDY

FINAL REPORT

Prepared For:

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December 2000

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